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Governor

KIM GUADAGNO
Lt. Governor

March 14, 2012

STEFANIE A. BRAND
Director

VIA ECFS

Marlene H. Dortch, Secretary
 Federal Communications Commission
 Office of the Secretary
 445 12th Street, SW
 Washington, DC 20554

In the Matter of:

**CenturyLink's Petition for Forbearance Pursuant
 To 47 U.S.C. §160(c) from dominant Carrier and
 Certain *Computer Inquiry* Requirements on
 Enterprise Broadband Services**

WC Docket 12-60

**To: Secretary Federal Communications Commission
 Chief, Media Bureau**

Dear Secretary Dortch:

On behalf of The National Association of State Utility Consumer Advocates ("NASUCA") and The New Jersey Division of Rate Counsel, (collectively "Consumer Advocates"), enclosed please find a motion for extension of time. We request that the Commission extend the deadline for filing of comments to 30 days after the proprietary version is received by parties and reply comments be extended to 45 days after the proprietary version is received by parties.

Respectfully submitted,

STEFANIE A. BRAND
 DIRECTOR, DIVISION OF RATE
 COUNSEL

By:

Christopher J. White
 Deputy Rate Counsel

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
CenturyLink's Petition for Forbearance)	WC Docket No. 12- 60
Pursuant to 47 U.S.C. §160(c) from Dominant)	
Carrier and Certain <i>Computer Inquiry</i>)	
Requirements on Enterprise Broadband)	
Services)	

MOTION FOR EXTENSION OF TIME

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Dated: March 14, 2012

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, The National Association of State Utility Consumer Advocates and the New Jersey Division of Rate Counsel (collectively, "Consumer Advocates") hereby request that the Commission extend the deadline for filing of comments and reply comments set forth in Public Notice (DA 112-346), dated March 6, 2012, regarding the CenturyLink Petition for Forbearance with respect to its obligations under "dominant carrier regulation and the *Computer Inquiry* tariffing requirements with respect to its packet-switched and optical transmission services," under 47 U.S.C. §§ 203, 204(a)(3); 47 C.F.R. §§ 1.54(a)(1), (e)(1), 61.31-61-59, 63.71, 63.03 and requirements from related Commission Orders.¹ Consumer Advocates request a thirty (30) day extension from the time when the non-redacted proprietary CenturyLink Petition is received by the parties for the filing of Initial Comments and Reply Comments to be filed forty-five (45) days later.

CenturyLink's forbearance filing raises numerous issues which need to be fully reviewed and addressed by parties submitting comments and it is unreasonable to require parties to review and prepare comments in this filing without affording the parties the opportunity to review a non-redacted proprietary copy of the filing. The Commission's own *Informal Timeline under Section 10 Forbearance Petitions* provides that the Public Notice along with *Protective Orders* be issued simultaneously at or on about the 15th day from receipt of a deemed "complete as filed" petition.² Consumer Advocates note that *Protective Orders* have not yet been issued in this

¹ / *I/M/O Petition of CenturyLink for Forbearance Pursuant to 47 U.S.C. § 160(c) from Dominant Carrier and Certain Computer Inquiry Requirements on Enterprise Broadband Services*, WC Docket No. 12-60 (filed Feb. 23, 2012). (CenturyLink Petition).

² / See FCC's Informal Timeline for Section 10(c) Forbearance Petitions:
<http://transition.fcc.gov/wcb/cpd/forbearance/timeline.html>.

filing and parties have not been able to access a non-redacted proprietary copy of CenturyLink's forbearance filing. In light of this, it is inherently unfair under these circumstances not to extend the initial comment filing cycle by 30 days and 15 days for reply comments, after *Protective Orders* have been issued and parties have obtained copies of the proprietary filing.

The decision and order which the Commission renders in this matter will have far reaching impact on not only ratepayers but on the industry as a whole. Consumer Advocates urge the Commission to afford parties a full opportunity to provide meaningful comment on the forbearance sought in this filing by CenturyLink. A thirty/fifteen (30/15) day extension on the initial and reply comment cycle requested by Consumer Advocates in this matter is warranted, given the important ramifications of the CenturyLink Forbearance Petition. The limited additional time requested will enable a full and careful analysis of the issues without causing undue delay in the process.

For the foregoing reasons, Consumer Advocates respectfully request that the Commission grant this motion and grant the extension requested.

Respectfully submitted,

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